UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

THE UNITED STATES OF AMERICA,

v.

SAINT JOVITE YOUNGBLOOD a.k.a. Kota Youngblood, Defendant. CRIMINAL NO. A-23-CR-135-RP

GOVERNMENT'S EXPERT NOTICE

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The United States of America hereby gives notice, pursuant to Federal Rule of Evidence 702 and Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, that the Government intends to call the following expert witness at trial. A summary of his testimony is provided below, with supplemental reports, as appropriate, having been provided in discovery. The Government reserves the right to amend or supplement this Notice as additional experts are identified or as otherwise appropriate.

Jason Rzepniewski

Jason Rzepniewski is a gemologist, accredited jewelry professional, accredited member of the International Society of Appraisers, and a Graduate Personal Property Appraiser. He currently works for Gaston & Sheehan Auctioneers as a lead appraiser, a position he has held since 2006, and as a project manager for the United States Marshals Service National Jewelry, Art, Antiques, and Collectibles contract since 2009. Mr. Rzepniewski will offer opinions about the approximate values of items he inspected on behalf of the FBI, as described in his report, which has been provided to the defense. In summary, Mr. Rzepniewski will opine that most of the items he examined at seven locations, including Youngblood's residence, would have resale value of less

than \$500; many items would have an approximate resale value below \$100; and none of the items were of "exceptional or high value," as defined in his report. Mr. Rzepniewski based his opinions on his personal observations of the items he examined, as well as his training, experience, and consultation with other experienced appraisers. Mr. Rzepniewski's report, as well as a more detailed description of his education, training, and professional experience is attached to this notice as Attachment A.

Respectfully submitted,

JAIME ESPARZA United States Attorney

By: /s/
MATT HARDING
DANIEL D. GUESS
Assistant United States Attorneys

Certificate of Service

On March 14, 2024, I caused a true copy of the foregoing to be served on the following

via the ECF system:	
Charly Herring Jose Gonzalez-Falla Attorneys for Defendant Saint Jovite Y	Youngblood
By:/s/_ MATT HARDING Assistant United States Attorney	